

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Newport News Division

SHARLENE CHAPMAN,

Plaintiff,

v.

AVERETT UNIVERSITY,

Defendant.

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Case No.: 4:24-cv-00129

MOTION TO DISMISS COMPLAINT

Defendant Averett University (“Averett” or the “University”), by counsel, and pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure hereby moves to dismiss Plaintiff Sharlene Chapman’s action for failure to state a claim upon which relief may be granted. The reasons supporting this Motion are set forth in the accompanying Memorandum of Law.

Respectfully submitted,

AVERETT UNIVERSITY

By: /s/ Stephanie P. Karn
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Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30th day of January 2025, I electronically filed the foregoing Defendant's Motion to Dismiss Complaint with the Clerk of Court using the CM/ECF system, and have sent notice by mail and electronic mail to the following:

Sharlene Chapman, *Pro Se Plaintiff*
34 Scotland Rd.
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